

## **REMARKS**

Claims 1-14, 16, 19, 21, 22, 24, 30-32, 34, 36 and 38-46 were pending in this application. In the Office Action dated August 30, 2010, claims 1-14, 16, 19, 21, 22, 24, 30-32, 34, 36 and 38-46 were rejected.

Claims 1, 21, 34 and 44-46 are hereby amended to specifically recite inherent aspects. No claim is added or canceled herein.

Based on the above Amendment and following Remarks, withdrawal of the outstanding rejections is respectfully requested.

### **Response to Rejection under 35 U.S.C. § 112, First Paragraph**

In the Office Action, claims 1, 21 and 34 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claim 1 is hereby amended to recite “monitoring second *non*-VoIP voice signals . . . .” Claims 21 and 34 are also similarly amended to recite “monitor [monitoring] the second non-VoIP voice signals . . . .” Hence, claims 1, 21 and 34 no longer state that “second VoIP voice signals” are monitored. Therefore, this rejection is overcome in view of the amendments.

### **Response to Rejection under 35 U.S.C. § 103(a)**

In the Office Action, Claims 1-14, 16, 19, 21, 22, 24, 30-32, 34, 36 and 38-43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,203,186 (“Fuller”) in view of U.S. Patent No. 7,075,922 (“Mussman”) and U.S. Patent No. 5,655,013 (“Gainsboro”). This rejection is overcome in view of the amendments.

Independent claim 1, as amended, recites in part:

a first processor-based system coupled to a plurality of telephone terminals disposed within said prison facility . . . wherein the first processor-based system comprises a first unauthorized call activity detector for monitoring fraudulent or unauthorized call activity associated with the calls; and

a second processor-based system communicating with said first processor-based system via a digital data link and disposed remotely from the first processor-based system, said second processor-based system configured to . . .

wherein the second processor-based system comprises a second unauthorized call detector for monitoring the second non-VoIP voice signals to detect the fraudulent or unauthorized call activity in the calls. (Emphasis added).

Per claim 1, a first processor-based system is coupled to a plurality of telephone terminals disposed within a prison facility. A second processor-based system communicates with the first processor-based system via a digital link and is disposed remotely from the first processor-based system. Both the first processor-based system and the second processor-based system comprise unauthorized call activity detectors that monitor fraudulent or unauthorized call activity associated with calls.

The feature of “wherein the first processor-based system comprises a first unauthorized call activity detector for monitoring fraudulent or unauthorized call activity associated with the calls . . . wherein the second processor-based system comprises a second unauthorized call detector for monitoring the second non-VoIP voice signals to detect the fraudulent or unauthorized call activity in the calls,” as recited in claim 1 is advantageous, among other reasons, because fraudulent or unauthorized call activity can be detected more accurately and also implement redundancy for failure of one unauthorized call detector. See, for example, paragraph [0053] of the specification.

None of the cited references disclose this feature. As admitted in the Office Action, Fuller fails to disclose anything about detecting fraudulent or unauthorized call activity in the calls. Consequently, Fuller fails to disclose anything about providing two unauthorized call detectors in two separate locations.

Nor does Mussman disclose this feature. Mussman at best discloses call screening at gatekeeper 2010 to decide, for example, whether an inbound call is to be allowed into a network. See Mussman, 3:64-4:14; and FIG. 4. In Mussman, the call screening is performed only at gatekeeper 2010. Nowhere in Mussman does it disclose that call screening is performed at two separate locations. Therefore, Mussman fails to disclose “wherein the first processor-based system comprises a first unauthorized call activity detector for monitoring fraudulent or unauthorized call activity associated with the calls . . . wherein the second processor-based system comprises a second unauthorized call detector for monitoring the second non-VoIP voice signals to detect the fraudulent or unauthorized call activity in the calls,” as recited in claim 1, as amended.

Gainsboro also fails to disclose this feature. Gainsboro at best discloses detecting and thwarting unauthorized three-way calling, call conferencing, call transferring, call forwarding or re-dialing at a single TMU. See Gainsboro, 2:34-41. Nowhere in Gainsboro does it disclose that detection of unauthorized or fraudulent calls is performed at two different locations.

Therefore, claim 1, as amended, is patentably distinguishable over the combination of Fuller, Mussman and Gainsboro for reciting the feature of “wherein the first processor-based system comprises a first unauthorized call activity detector for monitoring fraudulent or unauthorized call activity associated with the calls . . . wherein the second processor-based system comprises a second unauthorized call detector for monitoring the second non-VoIP voice signals to detect the fraudulent or unauthorized call activity in the calls . . . .”

Claims 2-14, 16, 19 and 41 depend from claim 1; and therefore, the arguments set forth above for claim 1 are equally applicable to claims 2-14, 16, 19 and 41. Accordingly, claims 2-14, 16, 19 and 41 are also patentably distinguishable from Fuller, Mussman and Gainsboro.

Similarly, independent claim 21, as amended, recites the feature of “call processing platform being coupled to a carrier network and configured to . . . monitor the second non-VoIP voice signals to detect fraudulent or unauthorized call activity in the calls . . . each call processing gateway associated with a prison facility to process the second VoIP voice signals . . . for detecting the fraudulent or unauthorized call activity in the calls.” Therefore, essentially the same arguments set forth above for claim 1 are equally applicable to claim 21 and its dependent claims 22, 24, 30-32 and 42. Accordingly, claims 22, 24, 30-32 and 42 are also patentably distinguishable from Fuller, Mussman and Gainsboro.

Independent claim 34 also recites the feature of “converting the second non-VoIP voice signal to a second VoIP voice signal . . . for monitoring fraudulent or unauthorized call activity at the one of the plurality of process-based systems; and monitoring the second non-VoIP voice signal for the fraudulent or unauthorized call activity.” Therefore, essentially the same arguments set forth above for claim 1 are equally applicable to claims 34 and its dependent claims 36, 38-40 and 43. Accordingly, claims 34 and its dependent claims 36, 38-40 and 43 are also patentably distinguishable from the combination of Fuller, Mussman and Gainsboro.

Applicants respectfully submit that for at least these reasons, claims 11-14, 16, 19, 21, 22, 24, 30-32, 34, 36 and 38-43 are patentably distinguishable over Fuller, Mussman and Gainsboro, both alone and in combination.

In the Office Action, claims 44-46 were rejected as being unpatentable over Fuller in view of Mussman and Gainboro and further in view of U.S. Patent No. 5,682,386 (“Arimilli”). Claims 44-46 depend from claim 1, 21 or 34. As set forth above, Fuller, Mussman and

Gainsboro fail to disclose anything about detecting unauthorized or fraudulent calls at two separate locations. Nor does Arimilli disclose this feature. Arimilli was cited in the Office Action merely for allegedly disclosing silence detection function. Nowhere in Arimilli does it disclose anything about detecting unauthorized or fraudulent calls at two different locations. Hence, claims 44-46 are patentably distinguishable over the cited references based on the same reasons as set forth above for claims 1, 21 and 34.

Applicants respectfully submit that for at least these reasons, all pending claims are patentably distinguishable over the cited references, both alone and in combination. Therefore, Applicants respectfully request that the Examiner reconsider the rejection, and withdraw it.

#### **Conclusion**

Favorable action is solicited.

Respectfully Submitted,

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